BNSF RAILWAY

Todd Graetz
Director

**BNSF Railway Company
Technology Services**

2400 Western Center Blvd.
Fort Worth, Texas 76131
817-867-0282 (phone)
todd.graetz@bnsf.com

January 19, 2022

Mr. Jake Troutman
Program Analyst | Rulemaking
800 Independence Avenue, S.W.
Washington, DC. 20591

RE: Request to Amend Exemption No. 18823 | Regulatory Docket No.FAA-2020-0620

Dear Mr. Troutman:

BNSF Railway Company (BNSF) hereby requests that Exemption No. 18823, granted to BNSF on June 10, 2021, be amended to include authorization to use the Skydio X2 dock or "hangar box."

The exemption as granted provides partial relief from §107.15 and §107.49 and covers the aircraft (Skydio S2, Skydio X2, Easy Aerial Osprey) and hangar boxes (Skydio S2 Dock, Easy Aerial EasyGuard) for which technical documentation was submitted for the original application. Similar technical documentation describing the Skydio X2 Dock (and updated documentation for the Skydio X2 aircraft) are provided outside the docket since the manufacturer considers these documents to be proprietary information.

The Skydio X2 Dock has materially identical functionality to the Skydio S2 Dock but is designed to house the Skydio X2 aircraft and to provide additional environmental protections appropriate to the environment in which BNSF will be operating the aircraft. The Skydio X2 aircraft also has materially identical functionality to the Skydio S2 aircraft. The Concept of Operations, safety case, and safety mitigations all remain the same as originally submitted to obtain this exemption when using the X2 aircraft and X2 Dock.

The associated waiver (107W-2021-01756) will also need to be amended in concert with the exemption amendment. BNSF intends to submit a separate request for such amendment through DroneZone.

Your time and cooperation are much appreciated. We look forward to discussing this request for amendment with you. In the interim, if you have any questions regarding our request, please do not hesitate to contact me.

Sincerely,

Todd Graetz

Todd Graetz
Director
UAS Program & Machine Vision Services